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Attorney for Defendant – SHI KOZULYN BASS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
* * *

UNITED STATES OF AMERICA,)	2:22-CR-00221-JCM-NJK-2
)	
)	
Plaintiff,)	
)	
v.)	1 ST Request
)	
SHI KOZULYN BASS,)	
)	
Defendant.)	

STIPULATION AND ORDER TO CONTINUE STATUS HEARING

IT IS HEREBY STIPULATED AND AGREED by and between OSVALDO E. FUMO, ESQ., Counsel for Defendant SHI KOZULYN BASS and JEAN RIPLEY, Assistant United States Attorney, that STATUS HEARING currently scheduled for June 10, 2024 at 10:30 a.m., be vacated and reset to a date and time convenient to the court but no earlier than ninety (90) days.

This Stipulation is entered into for the following reasons:

1. Counsel has spoken to Defendant and she has no objection to the request for continuance.
2. Defendant is currently out on pretrial release.

3. Counsel for defendant has spoken to AUSA and she has no objection to the continuance.
4. Counsel and Government are continuing to have discussions on a resolution.
5. Counsel needs additional time to adequately review the case and/or resolve the matter.
6. Denial of this request for continuance could result in a miscarriage justice.
7. For all the above-stated reasons, the ends of justice would best be served by a continuance of the status hearing until a date and time convenient to the court.

This is the 1st request for continuance filed herein.

DATED: June 7, 2024

/s/ Osvaldo E. Fumo Esq.
OSVALDO E. FUMO, ESQ.
601 Las Vegas Boulevard, South
Las Vegas, Nevada 89101
ATTORNEY FOR THE DEFENDANT
SHI KOZULYN BASS

/s/ Jean Ripley , Esq.
JEAN RIPLEY, ESQ.
ASSISTANT UNITED STATES ATTORNEY
501 LAS VEGAS BOULEVARD SOUTH. #1100
LAS VEGAS, NEVADA 89101
ATTORNEY FOR UNITED STATES OF
AMERICA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,) 2:22-CR-00221-JCM-NJK-2
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Plaintiff,)
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v.) 1ST Request
)
SHI KOZULYN BASS,)
)
Defendant.)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

This Stipulation is entered into for the following reasons:

1. Counsel has spoken to Defendant and she has no objection to the request for continuance.
2. Defendant is currently out on pretrial release.
3. Counsel for defendant has spoken to AUSA and she has no objection to the continuance.
4. Counsel and Government are continuing to have discussions on a resolution.
5. Counsel needs additional time to adequately review the case and/or resolve the matter.
6. Denial of this request for continuance could result in a miscarriage justice.
7. For all the above-stated reasons, the ends of justice would best be served by a continuance of the status hearing until a date and time convenient to the court.

Denial of this request for continuance would deny the parties herein the opportunity to effectively and thoroughly prepare for Status Hearing.

ORDER

DATED June 7, 2024.

James C. Mahan
UNITED STATES DISTRICT JUDGE